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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	Chapter 11
)	
CIRCUIT CITY STORES, INC.,)	Case No. 08-35653-KRH
<u>et al.</u> ,)	
)	
)	Jointly Administered
Debtors.)	
)	

**NOTICE OF MOTION AND NOTICE OF HEARING ON
MOTION OF THE PLAN PROPONENTS UNDER BANKRUPTCY CODE SECTIONS 105,
1125, 1126, AND 1128 AND BANKRUPTCY RULES 2002, 3017, 3018 AND
3020 FOR ORDER APPROVING (I) DISCLOSURE STATEMENT, (II) NOTICE OF
THE DISCLOSURE STATEMENT HEARING, (III) HEARING DATE TO CONSIDER
CONFIRMATION OF THE PLAN, (IV) PROCEDURES FOR FILING OBJECTIONS TO
PLAN, (V) VOTING AGENT AND DEADLINES RELATED TO SOLICITATION AND
CONFIRMATION, (VI) PROCEDURES WITH RESPECT TO CERTAIN CLAIMS AND
(VII) SOLICITATION PROCEDURES FOR CONFIRMATION OF THE PLAN**

PLEASE TAKE NOTICE that on August 28, 2009, the above-captioned debtors and debtors-in-possession (the "Debtors") and the statutory committee of unsecured creditors (the "Creditors' Committee" and together with the Debtors, the "Plan Proponents") filed their Motion under Bankruptcy Code Sections 105, 1125, 1126, and 1128 and Bankruptcy Rules 2002, 3017, 3018 and 3020 for Order

Approving (I) Disclosure Statement, (II) Notice of the Disclosure Statement Hearing, (III) Hearing Date to Consider Confirmation of the Plan, (IV) Procedures for Filing Objections to Plan, (V) Voting Agent and Deadlines Related to Solicitation and Confirmation, (VI) Procedures with Respect to Certain Claims and (VII) Solicitation Procedures for Confirmation of the Plan (the "Motion").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.) Under Local Bankruptcy Rule 9013-1 and pursuant to the Court's ruling on August 27, 2009 (Docket No. 4660), unless a written response to the Motion is filed with the Clerk of the Court and served on the moving party, the trustee and those parties as required by the Order Pursuant to Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1 and 9013-1 Establishing Certain Notice, Case Management and Administrative Procedures (entered on November 13, 2008 at Docket No. 130) (the "Case Management Order") no later than two (2) business days before the scheduled hearing date, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you do not want the Court to approve the Motion, or if you want the Court to consider your views on the Motion, then you or you attorney must:

- [X] File with the Court, either electronically or at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive it on or before September 18, 2009 at 4:00 p.m.**

Clerk of Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, Virginia 23219

- [X] Pursuant to the Case Management Order, you must also serve a copy of any written response and request for hearing by the foregoing date via electronic mail on the following: (i) the Core Group, which includes the Debtors, co-counsel to the Debtors, the Office of the United States Trustee, co-counsel for any committee, counsel to the agents for the Debtors' prepetition lenders, and counsel to the agents for the Debtors' postpetition lenders; (ii) the 2002 List; and (iii)

those additional parties as required by the Case Management Order (all of which are defined in the Case Management Order), which can be found at www.kccllc.net/circuitcity.

- [X] Attend a hearing before the Honorable Kevin Huennekens, United States Bankruptcy Judge, at 11:00 a.m. (Eastern Standard Time) on September 22, 2009 at the United States Bankruptcy Court, Room 5000, 701 East Broad Street, Richmond, Virginia 23219. If you or your attorney do not attend the hearing, the Court may grant the relief requested in the Motion.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting the relief requested.

Dated: August 28, 2009 SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP
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